

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

<b>DEBTORS:</b>  <b>IN RE:</b>  <b>REMARKABLE HEALTHCARE OF CARROLLTON, LP, <i>et al.</i>,<sup>1</sup></b>  <b>DEBTORS.</b>	<b>MAIN BANKRUPTCY CASE NO.:</b>  <b>CASE NO. 18-40295-BTR</b>  <b>CHAPTER 11</b>  <b>JOINTLY ADMINISTERED</b>
<b>CAPTION &amp; CASE NO. OF ADVERSARY:</b>  <b>N/A</b>	<b>DATE OF TRIAL/HEARING AND NATURE OF PROCEEDING:</b>  <b>October 1, 2018, at 10:00 a.m.</b>  <i>Comerica Bank's Motion to Terminate Exclusivity [Docket No. 169]</i>  <b>and</b>  <i>Debtors' Second Motion for Order Pursuant to Section 1121(d) Extending the Period Within Which the Debtors Have the Exclusive Right to Propose a Chapter 11 Plan and Solicit Acceptances Thereof [Docket No. 181]</i>

**WITNESS AND EXHIBIT LIST OF COMERICA BANK**

***Witnesses:***

1. David Jones, Portfolio Manager (Comerica Bank);
2. David Gorelick, Financial Advisory Manager (Huron Consulting Group);
3. Any authorized representative of the Debtors;
4. Any fact or expert witness called by any other party; and
5. Any rebuttal or impeachment witness.

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<sup>1</sup> The other debtors in these cases are (i) Remarkable Healthcare of Dallas, LP; (ii) Remarkable Healthcare of Fort Worth, LP; (iii) Remarkable Healthcare of Seguin, LP; and (iv) Remarkable Healthcare, LLC.

***Exhibits:***

<b>EXHIBIT</b>	<b>DESCRIPTION OF EXHIBIT</b>	<b>OFFERED</b>	<b>OBJECTION</b>	<b>ADMITTED</b>
1.	Letter Agreement dated as of February 27, 2014 (as amended or otherwise modified from time to time) between Remarkable Healthcare, LLC and Comerica Bank			
2.	Amended and Restated Master Revolving Note dated July 15, 2016 (as amended or otherwise modified from time to time) in the original principal amount of \$3,000,000.00, executed by Remarkable Healthcare, LLC and payable to the order of Comerica Bank			
3.	U.S. Small Business Administration Note dated February 6, 2013 (as amended or otherwise modified from time to time) in the original principal amount of \$800,000.00, executed by Remarkable Healthcare of Dallas, L.P. and payable to Comerica Bank			
4.	U.S. Small Business Administration Note dated April 28, 2014 (as amended or otherwise modified from time to time) in the original principal amount of \$800,000.00 executed by Remarkable Healthcare of Carrollton, L.P. and payable to the order of Comerica Bank			
5.	Debtors' February 2018 Monthly Operating Reports (Amended)			
6.	Debtors' March 2018 Monthly Operating Reports (Amended)			
7.	Debtors' April 2018 Monthly Operating Reports			
8.	Debtors' May 2018 Monthly Operating Reports			
9.	Debtors' June 2018 Monthly Operating Reports			
10.	Debtors' July 2018 Monthly Operating Reports			

EXHIBIT	DESCRIPTION OF EXHIBIT	OFFERED	OBJECTION	ADMITTED
11.	Letter from Jason Enright to Mark Castillo, dated April 5, 2018 regarding defaults under the cash collateral orders			
12.	<i>Final Order Authorizing the Debtors to Use Cash Collateral</i> [Docket No. 82]			
13.	<i>Debtors' Motion for Order Pursuant to Section 1121(d) Extending the Period Within Which the Debtors Have the Exclusive Right to Propose a Chapter 11 Plan and Solicit Acceptances Thereof</i> [Docket No. 112]			
14.	<i>Debtors' Motion Pursuant to 11 U.S.C. § 363 for Final Order Authorizing the Continued Use of Cash Collateral and Granting Adequate Protection</i> [Docket No. 116]			
15.	<i>Notice of Agreement to Extend Debtors' Use of Cash Collateral and of Agreed Budget</i> [Docket No. 130]			
16.	<i>[Committee's] Objection Debtors' Motion Pursuant to Section 1121(d) Extending the Period Within Which the Debtors Have the Exclusive Right to Propose a Chapter 11 Plan and Solicit Acceptances Thereof</i> [Docket No. 131]			
17.	<i>Comerica Bank's Objection Debtors' Motion Pursuant to Section 1121(d) Extending the Period Within Which the Debtors Have the Exclusive Right to Propose a Chapter 11 Plan and Solicit Acceptances Thereof</i> [Docket No. 136]			
18.	<i>Order Granting Debtors' Motion Pursuant to Section 1121(d) Extending the Period Within Which the Debtors Have the Exclusive Right to Propose a Chapter 11 Plan and Solicit Acceptances Thereof</i> [Docket No. 143]			

EXHIBIT	DESCRIPTION OF EXHIBIT	OFFERED	OBJECTION	ADMITTED
19.	<i>Agreed Order Regarding Debtors' Motion Pursuant to 11 U.S.C. § 363 for Final Order Authorizing the Continued Use of Cash Collateral</i> [Docket No. 144]			
20.	<i>Debtors' Application to Employ Montgomery Capital Advisers, LLC as Financial Advisor to the Debtors and Debtors-in-Possession</i> [Docket No. 154]			
21.	<i>Debtors' Application to Employ Griffin Financial Group, LLC as Investment Banker to the Debtors and Debtors-in-Possession</i> [Docket No. 159]			
22.	<i>Notice of Withdrawal [of Debtors' Application to Employ Montgomery Capital Advisers, LLC as Financial Advisor to the Debtors and Debtors-in-Possession]</i> [Docket No. 160]			
23.	<i>Order Approving Debtors' Application to Employ Griffin Financial Group, LLC as Investment Banker to the Debtors and Debtors-in-Possession</i> [Docket No. 164]			
24.	<i>Comerica Bank's Motion to Terminate Exclusivity</i> [Docket No. 169]			
	<i>Debtors' Second Motion for Order Pursuant to Section 1121(d) Extending the Period Within Which the Debtors Have the Exclusive Right to Propose a Chapter 11 Plan and Solicit Acceptances Thereof</i> [Docket No. 181]			
25.	Transcript of July 9, 2018 Hearing			
26.	Email communication between Comerica's counsel and Debtors' counsel, dated 8/7/18 to 8/3/18, with subject: <i>Re: Remarkable – Meeting between Debtors and Comerica pursuant to Exclusivity Order</i>			

EXHIBIT	DESCRIPTION OF EXHIBIT	OFFERED	OBJECTION	ADMITTED
27.	Email communication between Comerica's counsel and Debtors' counsel, dated 8/17/18 to 8/13/18, with subject: <i>Re: Remarkable – Meeting between Debtors and Comerica</i>			
28.	Email communication from between Comerica's counsel and Debtors' counsel, dated 9/17/18 to 9/13/18, with subject: <i>Re: Remarkable: Upcoming Hearing on Use of Cash Collateral</i>			
29.	Remarkable Healthcare Financial and Operating Trends, dated September 25, 2018, prepared by Huron			
30.	Remarkable Healthcare Debtor Report 6/1/18 – 6/7/18 Questions			
31.	Remarkable Healthcare Debtor Report 6/8/18 – 6/14/18 Questions			
32.	Remarkable Healthcare Debtor Report 6/15/18 – 6/21/18 Questions			
33.	Remarkable Healthcare Debtor Report 6/22/18 – 6/28/18 Questions			
34.	Remarkable Healthcare Debtor Responses to Huron Questions 6/22/18 – 6/28/18 on 7/17/18			
35.	Remarkable Healthcare Debtor Report 6/29/18 – 7/5/18 Questions			
36.	Remarkable Healthcare Debtor Report 7/6/18 – 7/12/18 Questions			
37.	Remarkable Healthcare Debtor Report 7/13/18 – 7/19/18 Questions			
38.	Remarkable Healthcare Debtor Report 7/20/18 – 7/26/18 Questions			
39.	Remarkable Healthcare Debtor Report 7/27/18 – 8/2/18 Questions			

EXHIBIT	DESCRIPTION OF EXHIBIT	OFFERED	OBJECTION	ADMITTED
40.	Remarkable Healthcare Debtor Report 8/3/18 – 8/9/18 Questions			
41.	Remarkable Healthcare Debtor Report 8/10/18 – 8/16/18 Questions			
42.	Remarkable Healthcare Debtor Report 8/24/18 – 8/30/18 Questions			
43.	Remarkable Healthcare Q4 2018 and FY 2019 Budget Questions List and Related Email Correspondence			
44.	Remarkable Healthcare March MOR Questions/Answers			
45.	AR Aging Report as of 9/15/18			
46.	RH Rolling Four-Week Cash Testing (20180925_v1)			
	Any exhibits designated by any other parties in interest			
	Any pleadings, reports, exhibits, transcripts, Court orders, or other documents filed in the above-referenced bankruptcy cases			
	Any impeachment or rebuttal exhibits			

Comerica Bank reserves the right to further amend or supplement this Witness and Exhibit List at any time prior to the October 1, 2018, hearing and/or in compliance with the Bankruptcy Local Rules and the Orders of this Court. Comerica Bank further reserves the right to provide any documents amended or supplemented in this Exhibit List to opposing counsel and to this Court as they become available.

**DATED: October 1, 2018**

**WINSTEAD PC**

/s/ Jason A. Enright

Joseph J. Wielebinski

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Jason A. Enright

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**ATTORNEYS FOR COMERICA BANK**

**Certificate of Service**

I hereby certify that on October 1, 2018, a true and correct copy of the foregoing document will be electronically mailed to the parties that are registered or otherwise entitled to receive electronic notices in this case pursuant to the Electronic Filing Procedures in this District.

/s/ Jason A. Enright

One of Counsel